

**Marchesini Group S.p.A.**

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**Società a Socio Unico**

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Capitale Sociale € 12.528.600,00 I.V.

## **PRIVACY INFORMATION IN RELATION TO VIDEO AND PHOTOGRAPHIC FOOTAGE CARRIED OUT AT EVENTS OPEN TO PUBLIC PARTICIPATION ("EVENTS") MPAZ. AND. DPMS017 part 17/02/2025**

**pursuant to and for the purposes of EU Regulation no. 679/2016 (commonly known as GDPR General Data Protection Regulation) and Legislative Decree no. 196 of 30 June 2003 and subsequent amendments. Mod.**

### **Premise**

This information is provided pursuant to Articles 12, 13 and 14 of R.E. 2016/679 in accordance with the legislation on the processing and protection of personal data in order to illustrate the methods of processing personal data relating to any event scheduled by Marchesini Group S.p.A. in the plants of Marchesini Group S.p.A..

The processing will be carried out in compliance with the principles of correctness, lawfulness, transparency, relevance, completeness and non-excessiveness, accuracy and with organisational and processing logics strictly related to the purposes pursued and in any case in such a way as to guarantee the security, integrity and confidentiality of the data processed, in compliance with the organisational, physical and logical measures provided for by the provisions in force.

Pursuant to the General Regulation for the Protection of Personal Data of Natural Persons (R.E. 2016/679) the undersigned organization, the data controller, informs of the following.

### **Data Controller.**

Marchesini Group S.p.A. (hereinafter referred to as Marchesini") with registered office in Pianoro (BO), Via Nazionale n. 100, e-mail: [privacy@marchesini.com](mailto:privacy@marchesini.com) in its capacity as Data Controller of personal data pursuant to Article 4 point 7 of the GDPR, informs you that your personal data will be processed in the following manner

### **Data Protection Officer.**

Marchesini has appointed the Data Protection Officer (so-called "*Data Protection Officer*" or "*DPO*"), pursuant to art. 37 of EU Reg. 679/2016, which can be contacted by the interested party at the e-mail address: [dpo@marchesini.com](mailto:dpo@marchesini.com).

### **Categories of personal data**

Images derived from video and/or photographic footage (hereinafter "Images") of those who attend or participate in the Events (hereinafter "Participants").

### **Purpose of the processing and legal basis.**

The Participants' Images collected during the event will be used for dissemination purposes through publication in the media (e.g. social media, website, newspapers, magazines, etc.) to promote the integration of the company with the territory and demonstrate its commitment to supporting and actively participating in local community life through the active involvement of the public. The purpose is therefore the collection of images of natural persons in the context of events by means of photos/video footage for publication (dissemination) purposes for dissemination purposes.

The legal basis for the collection of images of natural persons during the event, through photos or video footage, for publication and dissemination purposes, is based on legitimate interest pursuant to Article 6, letter F) of EU Regulation 679/2016 (GDPR) and Recital 47.

This is due to the practical difficulty of obtaining explicit consent from each individual and managing any refusals, as well as the minimization of personal data processing adopted, which includes:

- prevalent use of panoramic images that do not allow the unambiguous identification of the

- people filmed;
- respect for the decorum of the people filmed;
- Deletion of images depicting vulnerable individuals.

In addition, organisational and informative measures have been adopted to ensure the protection of the rights of data subjects, such as:

- information in the event registration form;
- information also available on the day of the event;
- possibility for the data subject to object to the processing;
- definition of the retention period of the published images;

The existence of a relevant and appropriate relationship between the data subject and the data controller, deriving from the registration for the event and the consequent role of participant, was also verified (cf. Recital 47 GDPR).

### **Processing methods.**

During the event, the Data Controller will take photographers, videomakers expressly appointed and authorized, video footage, photographs which, once selected and processed, will be published on the websites and/or social profiles of the Data Controller (e.g. Facebook, YouTube, Instagram, Twitter, etc.), newspapers, magazines, brochures, catalogs and/or other printed promotional material;

The images collected will be mainly aimed at the context in which the event itself takes place (main theme) and, in a merely secondary way (background or context) at the subjects present, taking care not to shoot the face of those present in the foreground or frontally but with angles that limit the recognizability of the subjects and/or taken at a distance.

Given the nature of the event, which does not allow direct contact with all Participants, the Data Controller prepares the possible measures according to the circumstances (e.g. posting of appropriate notices, with digital reference to this document), to inform the Participants that the creation of Images will take place during the Event and (by means of this document) that the presence at the Event itself constitutes implicit consent of the Participant to the free use of the Images also pursuant to art. 10 of the Civil Code and arts. 96 and 97 of Law no. 633 of 22 April 1941, as well as EU Regulation no. 2016/679 and national legislation on the protection of personal data to which the interested party can object by applying the right to object during the event by notifying the staff.

The use of the images does not entitle you to any compensation.

In any case, pursuant to the aforementioned article and pursuant to art. 10 of the Civil Code any use of the Images that may cause prejudice to the honour, reputation or decorum of the person portrayed, filmed or recorded.

With logics strictly related to the purposes of collection, procedures and security measures are adopted and observed to collect, store, use and allow the viewing of Raw Data, so as to always guarantee their protection from unauthorized or unlawful processing and from loss, destruction or accidental damage.

In particular, the images containing personal data are:

- collected exclusively for the purposes declared and subsequently processed in compliance with the same;
- adequate, relevant and limited with respect to the purposes stated above ("so-called data minimization");
- if necessary, updated, deleted, corrected, also based on any indications of the data subject;
- used and stored for a period of time not exceeding the achievement of the purposes for which they were collected.

To achieve the purposes of this policy, automated decisions based on personal data are not implemented.

### **Data retention period and criteria used for its determination.**



Personal data, including photographic images and/or audio-video recordings, will be processed by electronic and paper means in compliance with current legislation and in compliance with the security measures provided for by the GDPR and will be stored, also in electronic form and on any technological and paper support for the purposes and within the limits defined above.

In particular, the Raw Data and copies of the Selected Data will be stored in the Data Controller's computer archives exclusively to have a historical memory of the events and activities carried out and will be used for these purposes. The verification of the obsolescence of the data stored in relation to the purposes for which they were collected is carried out periodically and the maximum retention period is 5 years.

### **Categories of subjects to whom the data may be communicated.**

With the exception of the Selected Data, which will be made available to the public, the Raw Data may be communicated to the subjects delegated to carry out the services and activities requested, as well as to the activities to which the Data Controller is required by law. If necessary or appropriate, the subjects to whom the data are transmitted to carry out activities on behalf of the Data Controller will be appointed as Data Processors pursuant to art. 28 of R.E. 679/2016.

The Data Controller designates as "authorized subjects" to process all employees who perform tasks that involve the processing of personal data. These authorized persons operate under the supervision of the Data Controller and are required to comply with appropriate security measures in order to ensure the confidentiality and protection of personal data.

### **Transfer of personal data outside the EU**

With the exception of data intended for publication on the website and on social networks, for the purposes stated in this policy, Marchesini Group S.p.A. does not transfer your data outside the European Economic Area (EEA). However, if personal data is transferred to countries outside the European Economic Area (EEA), in the absence of an adequacy decision from the European Union Commission, we will ensure that appropriate safeguards are in place to protect personal data in these countries. Therefore, in this case, the "Standard Contractual Clauses" (SCCs) established by the European Commission pursuant to art. 46, par. 1, GDPR.

### **Rights of data subjects and right to lodge a complaint with the Supervisory Authority.**

As a data subject interested in the processing of their personal data, the Participant may exercise the rights recognized by articles 15 to 22 of the Regulation at any time.

In particular, in the manner and within the limits of the law, the data subject has the right to ask the Data Controller for access to his or her personal data, the rectification, erasure or limitation of the processing of personal data concerning him or her and to object to their processing.

To exercise their rights, the data subject may use the contact channels provided in this document.

Without prejudice to the possibility of contacting the Data Controller to obtain any information or to exercise their rights, the data subject may lodge a complaint with the Italian Data Protection Authority (GPDP): <https://www.garanteprivacy.it>

To exercise their rights, the interested party may use the contact channels provided in this document and send a request as indicated below: return receipt - Via Nazionale n.100 , Pianoro (BO) or email: [privacy@marchesini.com](mailto:privacy@marchesini.com) or to the contact details of the DPO: [dpo@marchesini.com](mailto:dpo@marchesini.com).